

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

---

CAROL A. BROWN,

Plaintiff,

v.

WIRECARD AG, BURKHARD LEY,  
JAN MARSALEK, WULF MATTHIAS,  
ALEXANDER VON KNOOP, MARKUS  
BRAUN, SUSANNE STEIDL, and  
ERNST & YOUNG GMBH  
WIRTSCHAFTSPRUEFUNGSELLSCHAFT,;

Defendants.

---

CIVIL ACTION NO. 2:2020-cv-03326-AB

**SUGGESTION OF BANKRUPTCY**

**PLEASE TAKE NOTICE** that on April 8, 2021, Dr. Michael Jaffe, the duly appointed insolvency administrator of defendant Wirecard AG (the “Debtor”) filed a verified petition in the United States Bankruptcy Court for the Eastern District of Pennsylvania (the “Bankruptcy Court”) under Chapter 15 of Title 11 of the United States Code (the “Bankruptcy Code”). The Debtor’s Chapter 15 case is pending at Bankruptcy No. 21-10936 (ELF).

**PLEASE TAKE FURTHER NOTICE** that on May 6, 2021, the Bankruptcy Court entered an order (the “Recognition Order”) granting recognition and relief in aid of a foreign main proceeding of the Debtor pursuant to sections 1504, 1509, 1515 and 1521 of the Bankruptcy Code. A copy of the Recognition Order is annexed hereto and made a part hereof as Exhibit “A”.

**PLEASE TAKE FURTHER NOTICE** that pursuant to sections 1520 and 362(a) of the Bankruptcy Code, the entry of the Recognition Order operates as a stay, applicable to all persons and entities, including the plaintiff herein, of, among other things: (a) the commencement or

continuation of all judicial, administrative, or other actions or proceedings against the Debtor in the United States (i) that were or could have been commenced before the entry of the Recognition Order or (ii) to recover any claims against the Debtor that arose before the entry of the Recognition Order; (b) the enforcement against the Debtor or against any property of the Debtor of a judgment obtained before the entry of the Recognition Order; or (c) any act to obtain possession of property of or from the Debtor or to exercise control over property of the Debtor.

Dated: May 10, 2021

**KURTZMAN | STEADY, LLC**

By: /s/ Jeffrey Kurtzman  
Jeffrey Kurtzman, Esquire  
**KURTZMAN | STEADY, LLC**  
555 City Avenue, Suite 480  
Bala Cynwyd, PA 19004  
Telephone: (215) 839-1222  
Email: [kurtzman@kurtzmansteady.com](mailto:kurtzman@kurtzmansteady.com)

- and -

Todd Goren, Esquire (admitted pro hac vice)  
**WILLKIE FARR & GALLAGHER LLP**  
787 Seventh Avenue  
New York, NY 10019-6099  
Telephone: (212) 728-8284  
Email: [tgoren@willkie.com](mailto:tgoren@willkie.com)

- and -

Joel C. Haims, Esquire (admitted pro hac vice)  
Andrew Kissner (admitted pro hac vice)  
Katherine Richardson Arnould (admitted pro hac vice)  
**MORRISON & FORERSTER LLP**  
250 W. 55<sup>th</sup> Street  
New York, NY 10019  
Telephone: (212) 468-8000  
Email: [AKissner@mofo.com](mailto:AKissner@mofo.com)  
[KRichardson@mofo.com](mailto:KRichardson@mofo.com)

**Attorneys for Wirecard AG**